Statement of Basis of the Federal Operating Permit

Pioneer Natural Resources USA, Inc.

Site Name: Fain Plants I & II
Area Name: Fain Plants I & II
Physical Location: 32540 Fain Plant Rd
Nearest City: Masterson
County: Potter

Permit Number: O4062 Project Type: Initial Issuance

The North American Industry Classification System (NAICS) Code: 211112
NAICS Name: Natural Gas Liquid Extraction

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). An application for initial permit issuance has been submitted in accordance with 30 TAC § 122.201. This document may include the following information:

A description of the facility/area process description;

A basis for applying permit shields;

A list of the federal regulatory applicability determinations;

A table listing the determination of applicable requirements;

A list of the New Source Review Requirements;

The rationale for periodic monitoring methods selected;

The rationale for compliance assurance methods selected;

A compliance status; and

A list of available unit attribute forms.

Prepared on: August 1, 2018

Operating Permit Basis of Determination

Permit Area Process Description

The Fain Plants I & II site is primarily a NGL recovery and sales gas separation plant. Plant equipment can include inlet, residue gas, and propane refrigerant compression, pipeline and compression-liquids separation, amine gas-sweetening, glycol and molecular sieve gas-dehydration, refrigeration and cryogenic NGL recovery, helium recovery, tankage, flare, and other various utility facilities

Field gas enters through pipeline(s) and is compressed by the inlet gas compressors. After separable liquids are removed from the compressed inlet gas stream, it is routed through one of two amine gas-sweetening units in order to remove carbon dioxide (CO2) and hydrogen sulfide (H2S) from the streams. The combined acid gas stream from the amine unit still column routes to the flare. One of the amine unit still columns is heated with a gas-fired reboiler and the other amine unit still column is heated with a hot oil-heated reboiler. The gas stream from one amine contactor flows through a glycol gas-dehydration unit, which removes most of the water from the gas stream. The gas streams from the amine and glycol units are then compressed by intermediate gas compressors before they flow through molecular sieve gas-dehydration units in order to remove remaining water from the gas streams before they enter the refrigeration and cryogenic units.

A compressor exhaust duct heater is used to heat the molecular sieve regeneration gas. The refrigeration and cryogenic units cool and remove energy from the gas streams which allows NGL to fall out and be separated from the gas streams. The NGL exits Fain through pipeline(s). Refrigerant compressors are used to compress the propane refrigerant. The helium recovery/nitrogen rejection unit separates much of the helium and nitrogen from the cryogenic unit residue gas, with the nitrogen being vented to atmosphere and the helium exiting Fain through pipeline(s). The residue gas streams from the cryogenic and/or helium recovery/nitrogen rejection unit is compressed by residue gas compressors before exiting Fain through pipeline(s).

The condensate/produced water tank battery associated with Fain is known as Tank Battery 2 (TB2). Combined liquids and gas streams from other Pioneer facilities reduce pressure as they flow into the TB2 separator, which operates at a pressure of approximately 20 to 30 pounds per square inch gauge (psig) and separates gas from the liquids stream. The separated gas stream flows into a low pressure process gas line flowing to another Pioneer facility. The separated liquids stream reduces pressure as it flows into nearly atmospheric TANK-1, which separates the condensate and produced water streams. The separated produced water stream flows into and is temporarily stored by nearly atmospheric TANK-6 before it is removed from the site by transport trucks and/or pipeline(s). The separated condensate stream flows into and is temporarily stored by nearly atmospheric TANK-2, TANK-3, TANK-4, and/or TANK-5 before it is removed from the site by transport trucks and/or pipeline(s). A vapor recovery unit (VRU) normally operates to collect vapors from all of the storage tanks and routes them into a low pressure process gas line flowing to another Pioneer facility. The displaced vapors from the loading of condensate into condensate trucks are vapor balanced through a hose back into the condensate storage tanks. MSS-related emissions may generally, but not always, periodically occur when the VRU is inoperable.

FOPs at Site

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: O3003

Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, SO2, NOX, HAPS, CO

Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
 - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
 - Additional Monitoring Requirements
 - New Source Review Authorization Requirements
 - Compliance Requirements
 - o Protection of Stratosphere Ozone
 - Permit Location
 - Permit Shield (30 TAC § 122.148)
- Attachments
 - Applicable Requirements Summary
 - Unit Summary
 - Applicable Requirements Summary
 - Additional Monitoring Requirements
 - o Permit Shield
 - New Source Review Authorization References
 - Compliance Plan
 - Alternative Requirements
- Appendix A
 - Acronym list
- Appendix B
 - Copies of major NSR authorizations

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Appendix B

Copies of major NSR authorizations applicable to the units covered by this permit have been included in this Appendix, to ensure that all interested persons can access those authorizations.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Stationary Vents subject to 30 TAC Chapter 111 not addressed in the Special Terms and Conditions

All other stationary vents subject to 30 TAC Chapter 111 not covered in the Special Terms and Conditions are listed in the permit's Applicable Requirement Summary. The basis for the applicability determinations for these vents are listed in the Determination of Applicable Requirements table.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	Yes
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	Yes
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	No
CSAPR (Cross-State Air Pollution Rule)	No

Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

- 1. Office activities such as photocopying, blueprint copying, and photographic processes.
- 2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
- 3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
- 4. Outdoor barbecue pits, campfires, and fireplaces.
- 5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.

- 6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
- 7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
- 8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
- 9. Vehicle exhaust from maintenance or repair shops.
- 10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
- 11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
- 12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
- 13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 15. Well cellars.
- 16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
- 17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
- 18. Equipment used exclusively for the melting or application of wax.
- 19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
- 20. Shell core and shell mold manufacturing machines.
- 21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
- 22. Equipment used for inspection of metal products.
- 23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
- 24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
- 25. Battery recharging areas.
- 26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air all ua forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found

in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*
AC-1	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0003	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than or equal to 100 HP and less than 250 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Emergency use where the RICE does not operate as specified in 40 CFR §63.6640(f)(2)(ii) and (iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).
			Stationary RICE Type = 4 stroke spark ignited lean burn engine.
C-10	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0002	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 4 stroke spark ignited lean burn engine.
C-11	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0002	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 4 stroke spark ignited lean burn engine.
C-12	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0002	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 4 stroke spark ignited lean burn engine.
C-14	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0002	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 4 stroke spark ignited lean burn engine.

Unit ID	Regulation	Index Number	Basis of Determination*
C-15	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0002	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 4 stroke spark ignited lean burn engine.
C-8	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0002	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 4 stroke spark ignited lean burn engine.
C-9	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0002	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 4 stroke spark ignited lean burn engine.
ENG-1	40 CFR Part 60, Subpart JJJJ	60JJJJ-4230	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification prior to June 12, 2006.
ENG-1	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-6590	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than or equal to 100 HP and less than 250 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Emergency use where the RICE does not operate as specified in 40 CFR §63.6640(f)(2)(ii) and (iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).
			Stationary RICE Type = 4 stroke spark ignited rich burn engine
ENG-2	40 CFR Part 60, Subpart JJJJ	60JJJJ-4230	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification prior to June 12, 2006.
ENG-2	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-6590	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than or equal to 100 HP and less than 250 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.

Unit ID	Regulation	Index Number	Basis of Determination*
			Service Type = Emergency use where the RICE does not operate as specified in 40 CFR §63.6640(f)(2)(ii) and (iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).
			Stationary RICE Type = 4 stroke spark ignited rich burn engine
FF-2	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0003	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP less than 100 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 4 stroke spark ignited rich burn engine
FF-3	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0003	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP less than 100 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 4 stroke spark ignited lean burn engine.
GMV-1	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0001	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 2 stroke spark ignited lean burn engine
GMV-2	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0001	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 2 stroke spark ignited lean burn engine
GMV-3	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0001	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 2 stroke spark ignited lean burn engine

Unit ID	Regulation	Index Number	Basis of Determination*
GMV-4	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0001	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 2 stroke spark ignited lean burn engine
GMV-5	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0001	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 2 stroke spark ignited lean burn engine
GMV-6	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0001	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 2 stroke spark ignited lean burn engine
GMV-7	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0001	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 2 stroke spark ignited lean burn engine
GMV-8	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0001	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 2 stroke spark ignited lean burn engine
HRA-1	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0001	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.

Unit ID	Regulation	Index Number	Basis of Determination*
			Service Type = Normal use.
			Stationary RICE Type = 2 stroke spark ignited lean burn engine
HRA-2	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0001	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 2 stroke spark ignited lean burn engine
JW-1	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0003	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP less than 100 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 4 stroke spark ignited lean burn engine.
JW-2	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0003	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP less than 100 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 4 stroke spark ignited lean burn engine.
JW-3	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0003	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP less than 100 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Service Type = Normal use.
			Stationary RICE Type = 4 stroke spark ignited lean burn engine.
HT-1	30 TAC Chapter 111, Incineration	R1112-0001	Hazardous Waste = The unit does not combust hazardous waste as a fuel for energy recover or does not meet the criteria for regulation.
PH-2A	30 TAC Chapter 111, Incineration	R1112-0001	Hazardous Waste = The unit does not combust hazardous waste as a fuel for energy recover or does not meet the criteria for regulation.
			Monitor = The unit does not have a continuous opacity or carbon dioxide monitor (or equivalent).

Unit ID	Regulation	Index Number	Basis of Determination*
FL-1	30 TAC Chapter 111, Visible Emissions	R1111-0001	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.
FL-1	40 CFR Part 60, Subpart A	60A-0001	Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18. Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4). Flare Assist Type = Non-assisted Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)
FL-1	40 CFR Part 63, Subpart A	63A-0001	Required Under 40 CFR Part 63 = Flare is required by a Subpart under 40 CFR Part 63. Heat Content Specification = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8). Flare Assist Type = Non-assisted Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)
DEA-1	30 TAC Chapter 112, Sulfur Compounds	R200-0001	Sulfur Recovery Plant = The gas sweetening unit is not using sulfur recovery.
DEA-1	40 CFR Part 60, Subpart LLL	PRO-AMINE1	Onshore = The sweetening unit is located onshore at a gas processing plant. Construction Date = After January 20, 1984 and on or before August 23, 2011. Acid Gas Vented = Acid gas is vented (acid gas is not completely reinjected into oil- or gas-bearing strata or is Design Capacity = Design capacity is less than 2 long tons/day.
DEA-2	30 TAC Chapter 112, Sulfur Compounds	R200-0001	Sulfur Recovery Plant = The gas sweetening unit is not using sulfur recovery.
DEA-2	40 CFR Part 60, Subpart LLL	PRO-AMINE2	Onshore = The sweetening unit is located onshore at a gas processing plant. Construction Date = After January 20, 1984 and on or before August 23, 2011. Acid Gas Vented = Acid gas is vented (acid gas is not completely reinjected into oil- or gas-bearing strata or is Design Capacity = Design capacity is less than 2 long tons/day.
C-1	40 CFR Part 60, Subpart GG	60GG-0001	NOx Control Method = NO_x control method other than water or steam injection or selective catalytic reduction. Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr). Construction/Modification Date = After October 3, 1977 and on or before January 27, 1982. NOx Allowance = The owner or operator is not electing to use a NO_x allowance in determining emission limits in 40 CFR § 60.332(a).

Unit ID	Regulation	Index Number	Basis of Determination*
			NOx Monitoring Method = Previously approved alternate for continuous monitoring of compliance with the applicable NO _x limit under 40 CFR § 60.332.
			Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.
			Turbine Cycle = Unit does not recover heat from the gas turbine exhaust to preheat inlet combustion air; or to heat water or generate steam.
			Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).
			Regulated Under Part 75 = Monitoring parameters are established under § 60.334(f) of Subpart GG.
			Subpart GG Service Type = Type of service other than research and development, emergency, military or electrical utility generation.
			Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.
			Turbine Combustion Process = Combustion process is diffusion flame combustion.
			Fuel Monitoring Schedule = Fuel meets the definition of natural gas in 40 CFR § 60.331(u) and is not monitored.
C-1	40 CFR Part 63, Subpart YYYY	63YYYY-0001	Construction/Reconstruction Date = Turbine was constructed, modified or reconstructed on or before 1/14/2003.
C-3	40 CFR Part 60,	,	NOx Control Method = NO _x control method other than water or steam injection or selective catalytic reduction.
	Subpart GG		Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr).
			Construction/Modification Date = On or after October 3, 1982 and before July 8, 2004.
			NOx Allowance = The owner or operator is not electing to use a NO_x allowance in determining emission limits in 40 CFR § 60.332(a).
			NOx Monitoring Method = Previously approved alternate for continuous monitoring of compliance with the applicable NO _x limit under 40 CFR § 60.332.
			Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.
			Turbine Cycle = Unit does not recover heat from the gas turbine exhaust to preheat inlet combustion air; or to heat water or generate steam.
			Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).
			Regulated Under Part 75 = Monitoring parameters are established under § 60.334(f) of Subpart GG.
			Subpart GG Service Type = Type of service other than research and development, emergency, military or electrical utility generation.
			Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.
			Turbine Combustion Process = Combustion process is diffusion flame combustion.
			Fuel Monitoring Schedule = Fuel meets the definition of natural gas in 40 CFR § 60.331(u) and is not monitored.
C-3	40 CFR Part 63, Subpart YYYY	63YYYY-0001	Construction/Reconstruction Date = Turbine was constructed, modified or reconstructed on or before 1/14/2003.
C-4	40 CFR Part 60, Subpart GG	60GG-0001	NOx Control Method = NO _x control method other than water or steam injection or selective catalytic reduction.

Unit ID	Regulation	Index Number	Basis of Determination*
			Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr).
			Construction/Modification Date = After October 3, 1977 and on or before January 27, 1982.
			NOx Allowance = The owner or operator is not electing to use a NO_x allowance in determining emission limits in 40 CFR § 60.332(a).
			NOx Monitoring Method = Previously approved alternate for continuous monitoring of compliance with the applicable NO_x limit under 40 CFR § 60.332.
			Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.
			Turbine Cycle = Unit does not recover heat from the gas turbine exhaust to preheat inlet combustion air; or to heat water or generate steam.
			Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).
			Regulated Under Part 75 = Monitoring parameters are established under § 60.334(f) of Subpart GG.
			Subpart GG Service Type = Type of service other than research and development, emergency, military or electrical utility generation.
			Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.
			Turbine Combustion Process = Combustion process is diffusion flame combustion.
			Fuel Monitoring Schedule = Fuel meets the definition of natural gas in 40 CFR § 60.331(u) and is not monitored.
C-4	40 CFR Part 63, Subpart YYYY	63YYYY-0001	Construction/Reconstruction Date = Turbine was constructed, modified or reconstructed on or before 1/14/2003.
C-5	40 CFR Part 60,	60GG-0002	NOx Control Method = NO _x control method other than water or steam injection or selective catalytic reduction.
	Subpart GG		Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr).
			Construction/Modification Date = On or after October 3, 1982 and before July 8, 2004.
			NOx Allowance = The owner or operator is not electing to use a NO_x allowance in determining emission limits in 40 CFR § 60.332(a).
			NOx Monitoring Method = Previously approved alternate for continuous monitoring of compliance with the applicable NO_x limit under 40 CFR § 60.332.
			Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.
			Turbine Cycle = Unit does not recover heat from the gas turbine exhaust to preheat inlet combustion air; or to heat water or generate steam.
			Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).
			Regulated Under Part 75 = Monitoring parameters are established under § 60.334(f) of Subpart GG.
			Subpart GG Service Type = Type of service other than research and development, emergency, military or electrical utility generation.
			Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.
			Turbine Combustion Process = Combustion process is diffusion flame combustion.
			Fuel Monitoring Schedule = Fuel meets the definition of natural gas in 40 CFR § 60.331(u) and is not monitored.

Unit ID	Regulation	Index Number	Basis of Determination*
C-5	40 CFR Part 63, Subpart YYYY	63YYYY-0001	Construction/Reconstruction Date = Turbine was constructed, modified or reconstructed on or before 1/14/2003.
C-6	40 CFR Part 60,	60GG-0002	NOx Control Method = NO_x control method other than water or steam injection or selective catalytic reduction.
	Subpart GG		Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr).
			Construction/Modification Date = On or after October 3, 1982 and before July 8, 2004.
			NOx Allowance = The owner or operator is not electing to use a NO_x allowance in determining emission limits in 40 CFR § 60.332(a).
			NOx Monitoring Method = Previously approved alternate for continuous monitoring of compliance with the applicable NO_x limit under 40 CFR § 60.332.
			Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.
			Turbine Cycle = Unit does not recover heat from the gas turbine exhaust to preheat inlet combustion air; or to heat water or generate steam.
			Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).
			Regulated Under Part 75 = Monitoring parameters are established under § 60.334(f) of Subpart GG.
			Subpart GG Service Type = Type of service other than research and development, emergency, military or electrical utility generation.
			Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.
			Turbine Combustion Process = Combustion process is diffusion flame combustion.
			Fuel Monitoring Schedule = Fuel meets the definition of natural gas in 40 CFR § 60.331(u) and is not monitored.
C-6	40 CFR Part 63, Subpart YYYY	63YYYY-0001	Construction/Reconstruction Date = Turbine was constructed, modified or reconstructed on or before 1/14/2003.
F-SBL	40 CFR Part 60, Subpart KKK	60KKK-0001	Facility Type = Affected facility is the group of all equipment except compressors within a process unit. Construction/Modification Date = After August 23, 2011.
F-SBL	40 CFR Part 60, Subpart VV	60VV-0001	Produces Chemicals = The fugitive unit is not part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489.
F-SBL	40 CFR Part 60, Subpart VVa	60VVA-0001	Produces Chemicals = The facility does not produce, as an intermediate or final product, one or more of the chemicals listed in 40 CFR § 60.489a.
F-SBL	40 CFR Part 61, Subpart J	61J-0001	40 CFR 61 (NESHAP) SUBPART J DESIGN CAPACITY = SITE IS DESIGNED TO PRODUCE OR USE 1,000 MEGAGRAMS OF BENZENE PER YEAR OR LESS
F-SBL	40 CFR Part 63, Subpart HH	63HH-0001	ALTERNATE MEANS OF EMISSION LIMITATION = NO APPROVED ALTERNATE MEANS OF EMISSION LIMITATION Subject to Another Regulation = Fugitive unit is subject to and controlled under the provisions of 40 CFR part 60, Subpart OOOO.

Unit ID	Regulation	Index Number	Basis of Determination*
F-SBL	40 CFR Part 63, Subpart I	63I-0001	PROCESS TYPE = Fugitive unit does not contain one of the processes listed in 40 CFR § 63.190(b)(1) - (6).
FUG-OOOOA	40 CFR Part 60, Subpart OOOOa	600000a-0001	Construction/Reconstruction/Modification Date = After September 18, 2015. Affected Facility Type = Reciprocating Compressor.
GRP-KKKPR	40 CFR Part 60, Subpart KKK	60KKK-0004	2% Valves Leaking = The owner or operator is electing to comply with an allowable percentage of valves leaking equal to or less than 2.0 percent.
			Closed Vent Systems = Closed-vent systems addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			Facility Type = Affected facility is the group of all equipment except compressors within a process unit.
			Heavy Liquid Service = No pump in heavy liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			Light Liquid Service = Pressure relief device in light liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			Open-Ended Valves or Lines = No open-ended valves or lines addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			Vacuum Service = No component in vacuum service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			Vapor Recovery System = No vapor recovery system addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			AMEL = Not using alternate means of emission limitation.
			Complying with § 60.482-10 = Complying with 40 CFR 60.482-10.
			Construction/Modification Date = After January 20, 1984 and on or before August 23, 2011.
			Gas/Vapor Service = Valves in gas/vapor service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			Non-VOC or Non-Wet Gas Service = No component in non-VOC or non-wet gas service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			AMEL = Not using alternate means of emission limitation.
			Facility Covered by 40 CFR Part 60, Subparts VV or GGG = Facility not covered by NSPS Subpart VV or Subpart GGG or NESHAP Subpart V.
			Light Liquid Service = Pump in light liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			AMEL = Not using alternate means of emission limitation.
			Complying with § 60.482-8 = Complying with 40 CFR 60.482-8.
			Compressors = Compressor in VOC or Wet Gas Service.
			Enclosed Combustion Device = No enclosed combustion device addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			Complying with § 60.482-7 = Complying with 40 CFR 60.482-7.
			Control Devices Used to Comply With AMEL = No control devices used to comply with AMEL.
			Flanges and Other Connectors = Flanges or other connectors addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			Gas/Vapor Service = Pressure relief device in gas/vapor service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.

Unit ID	Regulation	Index Number	Basis of Determination*
			Heavy Liquid Service = No pressure relief device in heavy liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			Reciprocating Compressor in Wet Gas Service = Reciprocating compressor not in wet gas service (or not reciprocating compressor).
			AMEL = Not using alternate means of emission limitation.
			Complying with § 60.482-2 = Complying with 40 CFR 60.482-2.
			Light Liquid Service = Valves in light liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			AMEL = Not using alternate means of emission limitation.
			Flare = Flare control device addressed in 40 CFR 60 (NSPS) Subpart KKK.
			Complying with § 60.482-3 = Complying with 40 CFR 60.482-3.
			Complying with § 60.482-4 = Complying with 40 CFR 60.482-4.
			Complying with § 60.482-8 = Complying with 40 CFR 60.482-8.
			Complying with § 60.482-10 = Flares are complying with the requirements of § 60.482-10.
			Complying with § 60.482-7 = Complying with 40 CFR 60.482-7.
GRP-KKKPR	40 CFR Part 63, Subpart HH	63HH-ALL	SOP/GOP Index No. = Owner/Operator assumes standard fugitive control requirements for all components in HAP service subject to MACT HH with no alternate control or control device.
			ALTERNATE MEANS OF EMISSION LIMITATION = NO APPROVED ALTERNATE MEANS OF EMISSION LIMITATION
			Subject to Another Regulation = Fugitive unit is subject to and controlled under the provisions of 40 CFR part 63, Subpart HH.
GRP-KKKWG	40 CFR Part 60, Subpart KKK	60KKK-0003	2% Valves Leaking = The owner or operator is electing to comply with an allowable percentage of valves leaking equal to or less than 2.0 percent.
			Closed Vent Systems = No closed-vent systems addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			Facility Type = Affected facility is the group of all equipment except compressors within a process unit.
			Heavy Liquid Service = No pump in heavy liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			Light Liquid Service = No pressure relief device in light liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			Open-Ended Valves or Lines = No open-ended valves or lines addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			Vacuum Service = No component in vacuum service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			Vapor Recovery System = No vapor recovery system addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			AMEL = Not using alternate means of emission limitation.
			Construction/Modification Date = After January 20, 1984 and on or before August 23, 2011.
			Gas/Vapor Service = Valves in gas/vapor service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			Non-VOC or Non-Wet Gas Service = Component in non-VOC or non-wet gas service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			AMEL = Not using alternate means of emission limitation.

Unit ID	Regulation	Index Number	Basis of Determination*
			Facility Covered by 40 CFR Part 60, Subparts VV or GGG = Facility not covered by NSPS Subpart VV or Subpart GGG or NESHAP Subpart V.
			Light Liquid Service = No pump in light liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			AMEL = Not using alternate means of emission limitation.
			Complying with § 60.482-6 = Not complying with 40 CFR 60.482-6.
			Complying with § 60.482-8 = Not complying with 40 CFR 60.482-8.
			Compressors = Compressor in VOC or Wet Gas Service.
			Enclosed Combustion Device = No enclosed combustion device addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			Complying with § 60.482-7 = Complying with 40 CFR 60.482-7.
			Control Devices Used to Comply With AMEL = No control devices used to comply with AMEL.
			Flanges and Other Connectors = Flanges or other connectors addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			Gas/Vapor Service = Pressure relief device in gas/vapor service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			Heavy Liquid Service = No pressure relief device in heavy liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			Reciprocating Compressor in Wet Gas Service = Reciprocating compressor in wet gas service.
			AMEL = Not using alternate means of emission limitation.
			Complying with § 60.482-2 = Not complying with 40 CFR 60.482-2.
			Light Liquid Service = No valves in light liquid service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.
			AMEL = Not using alternate means of emission limitation.
			Flare = No flare control device addressed in 40 CFR 60 (NSPS) Subpart KKK.
			Complying with § 60.482-3 = Not complying with 40 CFR 60.482-3.
			Complying with § 60.482-4 = Complying with 40 CFR 60.482-4.
			Complying with § 60.482-8 = Not complying with 40 CFR 60.482-8.
			Complying with § 60.482-8 = Complying with 40 CFR 60.482-8.
			Complying with § 60.482-7 = Not complying with 40 CFR 60.482-7.
GRP-KKKWG	40 CFR Part 63, Subpart HH	63HH-ALL	SOP/GOP Index No. = Owner/Operator assumes standard fugitive control requirements for all components in HAP service subject to MACT HH with no alternate control or control device.
			ALTERNATE MEANS OF EMISSION LIMITATION = NO APPROVED ALTERNATE MEANS OF EMISSION LIMITATION
			Subject to Another Regulation = Fugitive unit is subject to and controlled under the provisions of 40 CFR part 63, Subpart HH.
GRP-NONVOC	40 CFR Part 60,	60KKK-0002	Facility Type = Facility neither a compressor nor an affected facility as defined in 60.630(a)(3).
	Subpart KKK		Non-VOC or Non-Wet Gas Service = Component in non-VOC or non-wet gas service addressed in 40 CFR 60 (NSPS) Subpart KKK included in the fugitive unit.

Unit ID	Regulation	Index Number	Basis of Determination*
GRP-OLD	40 CFR Part 60, Subpart KKK	60KKK-0001	Facility Type = Affected facility is the group of all equipment except compressors within a process unit. Construction/Modification Date = On or before January 20, 1984.
CT-1	40 CFR Part 63, Subpart Q	63Q-0001	Used Compounds Containing Chromium on or After September 8, 1994 = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.
WB-1	30 TAC Chapter 111, Visible Emissions	R1111-0002	Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113. Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit. Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3). Construction Date = After January 31, 1972 Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.
GLY	40 CFR Part 63, Subpart HH	63HH-0001	Alternate Means of Emission Limitation (AMEL) = The EPA Administrator has not approved an alternate means of emission limitation in accordance with 40 CFR § 63.777 or no alternate has been requested. Process Vent Control = Process vent is connected to a process natural gas line. HAP Source = Stationary source or group of stationary sources of HAPs meeting the definition of a major source as defined in 40 CFR § 63.761. Affected Source Type = Small glycol dehydration unit as defined in 40 CFR § 63.761.
GLY-2-VOC	40 CFR Part 63, Subpart HH	63HH-0005	Alternate Means of Emission Limitation (AMEL) = The EPA Administrator has not approved an alternate means of emission limitation in accordance with 40 CFR § 63.777 or no alternate has been requested. Control Device Type = Flare. Process Vent Control = Process vent is connected to a control device or a combination of control devices through a closed-vent system and the outlet benzene emissions from the control device(s) are reduced to a level less than 0.90 megagrams per year. Bypass Device = The closed-vent system does not contain bypass devices that could be used to divert all or a portion of the gases, vapors, or furnes from entering the control device. HAP Source = Stationary source or group of stationary sources of HAPs meeting the definition of a major source as defined in 40 CFR § 63.761. Affected Source Type = Large glycol dehydration unit as defined in 40 CFR § 63.761. Sealed Closed Vent System = The closed-vent system contains joints, seams, or other connections that are permanently or semi-permanently sealed. Unsafe to Inspect = No parts of the closed-vent system are designated as unsafe to inspect. Difficult to Inspect = Parts of the closed-vent system are designated as difficult to inspect, as described in 40 CFR § 63.773(c)(6)(i) - (ii).

^{* -} The "unit attributes" or operating conditions that determine what requirements apply

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. In addition, many of the permits are accessible online through the link provided below. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. Registrations submitted by permittees are also available online through the link provided below. The following table specifies the permits by rule that apply to the site.

The status of air permits, applications, and Permits by Rule (PBR) registrations may be found by performing the appropriate search of the databases located at the following website:

www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

Details on how to search the databases are available in the **Obtaining Permit Documents** section below.

New Source Review Authorization References

Prevention of Significant Deterioration (PSD) Permits		
PSD Permit No.: PSDTX798M1	Issuance Date: 02/20/2013	
Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.		
Authorization No.: 20711	Issuance Date: 02/20/2013	
Authorization No.: 48853	Issuance Date: 07/19/2012	
Permits By Rule (30 TAC Chapter 106) for the Application Area		
Number: 106.183	Version No./Date: 09/04/2000	
Number: 106.261	Version No./Date: 11/01/2003	
Number: 106.262	Version No./Date: 11/01/2003	
Number: 106.263	Version No./Date: 11/01/2001	
Number: 106.352	Version No./Date: 03/14/1997	
Number: 106.352	Version No./Date: 09/04/2000	
Number: 106.352	Version No./Date: 11/22/2012	
Number: 106.492	Version No./Date: 09/04/2000	
Number: 106.511	Version No./Date: 09/04/2000	
Number: 106.512	Version No./Date: 03/14/1997	
Number: 106.512	Version No./Date: 09/04/2000	
Number: 106.512	Version No./Date: 06/13/2001	
Number: 6	Version No./Date: 05/05/1976	
Number: 6	Version No./Date: 05/12/1981	
Number: 6	Version No./Date: 03/15/1985	
Number: 6	Version No./Date: 11/05/1986	

New Source Review Authorization References

Number: 6	Version No./Date: 10/04/1995
Number: 7	Version No./Date: 05/08/1972
Number: 8	Version No./Date: 09/23/1982
Number: 60	Version No./Date: 05/08/1972
Number: 64	Version No./Date: 05/08/1972
Number: 73	Version No./Date: 05/08/1972

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Periodic Monitoring:

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information		
ID No.: WB-1		
Control Device ID No.: N/A	Control Device Type: N/A	
Applicable Regulatory Requirement		
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-0002	
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(C)	
Monitoring Information		
Indicator: Visible Emissions		
Minimum Frequency: once per week		
Averaging Period: n/a		
Deviation Limit: Opacity shall not exceed 15% average	ged over a six-minute period.	
Basis of monitoring		

Basis of monitoring

The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.

Obtaining Permit Documents

The New Source Review Authorization References table in the FOP specifies all NSR authorizations that apply at the permit area covered by the FOP. Individual NSR permitting files are located in the TCEQ Central File Room (TCEQ Main Campus located at 12100 Park 35 Circle, Austin, Texas, 78753, Building E, Room 103). They can also be obtained electronically from TCEQ's Central File Room Online (https://www.tceq.texas.gov/goto/cfr-online). Guidance documents that describe how to search electronic records, including Permits by Rule (PBRs) or NSR permits incorporated by reference into an FOP, archived in the Central File Room server are available at https://www.tceq.texas.gov/permitting/air/nav/air status permits.html

All current PBRs are contained in Chapter 106 and can be viewed at the following website:

https://www.tceq.texas.gov/permitting/air/permitbyrule/air_pbr_index.html

Previous versions of 30 TAC Chapter 106 PBRs may be viewed at the following website:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html

Historical Standard Exemption lists may be viewed at the following website:

www.tceg.texas.gov/permitting/air/permitbyrule/historical rules/oldselist/se index.html

Additional information concerning PBRs is available on the TCEQ website:

https://www.tceg.texas.gov/permitting/air/nav/air pbr.html

Compliance Review

- 1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on <u>July 20, 2018.</u> Site rating: <u>0.00 / High</u> Company rating: <u>0.81 / Satisfactory</u> (High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)
- 2. Has the permit changed on the basis of the compliance history or site/company rating?......No

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS? Yes
2. Is a compliance plan and schedule included in the permit? Yes

<u>Permit reviewer notes</u>: Pioneer submitted a compliance schedule for flare FL-1. The flare is known to exceed NSR permit emissions limits, and the compliances schedule describes the plan for adding a new flare. The schedule also includes milestones with planned compliance by January 2019. The schedule was reviewed and approved by Region 1 on July 31, 2018.

Available Unit Attribute Forms

- OP-UA1 Miscellaneous and Generic Unit Attributes
- OP-UA2 Stationary Reciprocating Internal Combustion Engine Attributes
- OP-UA3 Storage Tank/Vessel Attributes
- OP-UA4 Loading/Unloading Operations Attributes
- OP-UA5 Process Heater/Furnace Attributes
- OP-UA6 Boiler/Steam Generator/Steam Generating Unit Attributes
- OP-UA7 Flare Attributes
- **OP-UA8 Coal Preparation Plant Attributes**
- OP-UA9 Nonmetallic Mineral Process Plant Attributes
- OP-UA10 Gas Sweetening/Sulfur Recovery Unit Attributes
- **OP-UA11 Stationary Turbine Attributes**
- OP-UA12 Fugitive Emission Unit Attributes
- OP-UA13 Industrial Process Cooling Tower Attributes

- OP-UA14 Water Separator Attributes
- OP-UA15 Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
- OP-UA16 Solvent Degreasing Machine Attributes
- OP-UA17 Distillation Unit Attributes
- OP-UA18 Surface Coating Operations Attributes
- OP-UA19 Wastewater Unit Attributes
- OP-UA20 Asphalt Operations Attributes
- OP-UA21 Grain Elevator Attributes
- OP-UA22 Printing Attributes
- OP-UA24 Wool Fiberglass Insulation Manufacturing Plant Attributes
- OP-UA25 Synthetic Fiber Production Attributes
- OP-UA26 Electroplating and Anodizing Unit Attributes
- OP-UA27 Nitric Acid Manufacturing Attributes
- OP-UA28 Polymer Manufacturing Attributes
- OP-UA29 Glass Manufacturing Unit Attributes
- OP-UA30 Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
- OP-UA31 Lead Smelting Attributes
- OP-UA32 Copper and Zinc Smelting/Brass and Bronze Production Attributes
- OP-UA33 Metallic Mineral Processing Plant Attributes
- OP-UA34 Pharmaceutical Manufacturing
- OP-UA35 Incinerator Attributes
- OP-UA36 Steel Plant Unit Attributes
- OP-UA37 Basic Oxygen Process Furnace Unit Attributes
- OP-UA38 Lead-Acid Battery Manufacturing Plant Attributes
- OP-UA39 Sterilization Source Attributes
- OP-UA40 Ferroalloy Production Facility Attributes
- OP-UA41 Dry Cleaning Facility Attributes
- OP-UA42 Phosphate Fertilizer Manufacturing Attributes
- OP-UA43 Sulfuric Acid Production Attributes
- OP-UA44 Municipal Solid Waste Landfill/Waste Disposal Site Attributes
- OP-UA45 Surface Impoundment Attributes
- OP-UA46 Epoxy Resins and Non-Nylon Polyamides Production Attributes
- OP-UA47 Ship Building and Ship Repair Unit Attributes
- OP-UA48 Air Oxidation Unit Process Attributes
- OP-UA49 Vacuum-Producing System Attributes
- OP-UA50 Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
- OP-UA51 Dryer/Kiln/Oven Attributes
- OP-UA52 Closed Vent Systems and Control Devices
- OP-UA53 Beryllium Processing Attributes
- OP-UA54 Mercury Chlor-Alkali Cell Attributes
- OP-UA55 Transfer System Attributes
- OP-UA56 Vinyl Chloride Process Attributes
- OP-UA57 Cleaning/Depainting Operation Attributes
- **OP-UA58 Treatment Process Attributes**
- OP-UA59 Coke By-Product Recovery Plant Attributes
- OP-UA60 Chemical Manufacturing Process Unit Attributes
- OP-UA61 Pulp, Paper, or Paperboard Producing Process Attributes
- OP-UA62 Glycol Dehydration Unit Attributes
- OP-UA63 Vegetable Oil Production Attributes